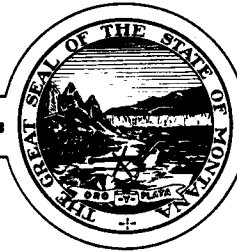


DEPARTMENT OF NATURAL RESOURCES  
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August 19, 1997

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AND WILDLIFE SERVICE  
GRIZZLY BEAR RECOVERY  
COORDINATORS OFFICE. 523.2

AUG 26 1997

Dr. Christopher Servheen  
U.S. Fish and Wildlife Service Project Leader  
Bitterroot Grizzly Bear EIS  
P.O. Box 5127  
Missoula, MT 59806

Dear Dr. Servheen:

Thank you very much for the opportunity to comment on the DEIS entitled "Grizzly Bear Recovery in the Bitterroot Ecosystem." The Montana Department of Natural Resources (DNRC) manages land currently occupied by grizzly bears in the Northern Continental Divide (NCDE) and Cabinet-Yaak (CYE) ecosystems. We have participated in management sub-committees of the Inter-Agency Grizzly Bear Committee (IGBC), and implemented restrictions and mitigations in our activities to integrate protection of grizzly bears and their habitat with our fiduciary responsibility to the various school trusts.

In general, the proposed action ("Reintroduction of a Nonessential Experimental Population") appears unlikely to produce substantial conflicts with our legal mandate. We would anticipate that any minor conflicts that did arise could be resolved satisfactorily.

1 We note with concern that some aspects of Alternative 4 ("Reintroduction of a Threatened Population with Full Protection of the ESA") are unclear or ambiguous with regard to possible effects on trust land management. The description of the Recovery Zone under this Alternative (pp. 2-32) would appear to encompass 7-8 mi<sup>2</sup> of state trust lands (in the Fish Creek drainage), for which management restrictions (if any) are not detailed. There are repeated references to a maximum road density of 0.25mi/mi<sup>2</sup>, but it is unclear whether these are intended to apply to non-federal lands. Timber management is generally not economical with road densities this low. Thus, if Alternative 4 were ultimately selected, and such restrictions were deemed necessary or desirable to achieve recovery, the USFWS may have to consider financial compensation to the trust.

Thank you for this opportunity to comment. We appreciate being informed as this project develops, and look forward to continuing our productive working relationship with the USFWS and other federal agencies.

Sincerely,

A handwritten signature in dark ink, appearing to read "P. J. Flowers".

PATRICK J. FLOWERS, Chief  
Forest Management Bureau  
Trust Land Management Division

PJF:kmk

cc: Rich Harris  
Ross Baty

Bill Schultz  
Jeff Hagener